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Attorney

April 25, 2023

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Reynolds et al. v. Marymount Manhattan College***

**Case No. 1:22-cv-6846**

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Dear Judge Schofield:

Under Paragraph III(C)(5) of Your Honor's Individual Rules & Procedures for Civil Cases, Plaintiffs submit the following outline of the potential allocation of the Settlement Fund:

**Marymount Manhattan College Settlement Allocation**

<b>Settlement Amount</b>	\$1,300,000.00
<b>Settlement Administration Costs</b>	\$169,521.00
<b>Class Representative Service Awards</b>	\$21,000.00
<b>Attorneys' Fees</b>	\$390,000.00
<b>Potential Litigation Expenses</b>	\$10,000.00
<b>Remainder for Allocation to Class Members</b>	\$709,479.00
<b>Number of Class Members</b>	191,752
<b>10% of Class Members</b>	19,175
<b>Value per Class Member at 10% Participation Rate</b>	\$37.00

Additionally, the following Settlement Timeline was included in the Proposed Order Granting Preliminary Approval of Class Action Settlement (Doc. 46-1 at 73):

**Notice Completion Deadline:** 30 Days after Preliminary Approval  
**Motion for Final Approval:** 30 Days before Final Approval Hearing  
**Motion for Service Awards, Attorneys' Fees and Costs:** 14-Days prior to the Objection  
Deadline and Opt-Out Deadline  
**Opt-Out Deadline:** 60 Days after Notice Completion  
**Objection Deadline:** 60 Days after Notice Completion

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**Replies in Support of Final Approval, Service Awards and Fee Requests:** 14 Days  
before Final Approval Hearing

**Claim Deadline:** 90 Days after Notice Completion

**Final Approval Hearing:** at least 110 Days after Preliminary Approval

I look forward to appearing before Your Honor this afternoon.

Respectfully Submitted,

/s/ Justin C. Walker

Justin C. Walker, Esq. (*pro hac vice*)

Markovits, Stock & DeMarco, LLC

*Attorney for Plaintiffs*

CC: Counsel for all parties via ECF